

HARRIS

ST. LAURENT

WECHSLER

June 14, 2023

By ECF

Hon. Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Ishan Wahi, 22-cr-392 (S.D.N.Y.)

Your Honor:

I am one of the lawyers representing defendant Ishan Wahi in this case. On May 9, 2023, the Court sentenced Ishan Wahi to 24 months of incarceration and directed him to surrender to a facility designated by the Bureau of Prisons before 2 p.m. on Wednesday, June 21, 2023. (Docket Entry 98). The Court subsequently extended Ishan Wahi's surrender date to June 26, 2023. (Docket Entry 103).

Previously, as part of the conditions of release, the Court had ordered that Ishan Wahi submit to location monitoring services by GPS as provided by Pretrial Services. (Docket Entry 20). Ishan Wahi has complied with this condition during the entire time of his release, in the form of an ankle monitor supplied by Pretrial Services. Last week Pretrial Services for the Southern District of Texas advised Ishan Wahi that he should have his ankle monitor removed 48 hours prior to surrendering to Bureau of Prisons custody. I have discussed this matter with Pretrial Services for the Southern District of New York and the government. Neither objects to this request.

Accordingly, I respectfully request the Court modify Ishan Wahi's conditions of release to relieve Ishan Wahi of the requirement to submit to location monitoring from June 24, 2023 to the date of his surrender to the Bureau of Prisons and to direct Pretrial Services to remove the ankle monitor on or around June 24, 2023 to facilitate Ishan Wahi's surrender to Bureau of Prisons.

Thank you for considering this request.

Respectfully,



Andrew St. Laurent

June 14, 2023

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cc: AUSA Noah Solowiejczyk (by ECF)
AUSA Nicolas Roos (by ECF)
David Miller, Esq. (by ECF)